	DISTRICT COURT
DISTRICT	OF NEVADA
Angel Garcia, Petitioner, v. Warden Baker, et al., Respondents.	Case No. 3:17-cv-00291-RCJ-CBC Unopposed Motion to Extend Time to File Amended Petition (Second Request)
	Federal Public Defender Nevada State Bar No. 11479 *Amelia L. Bizzaro Assistant Federal Public Defender Wisconsin State Bar No. 1045709 411 E. Bonneville Ave., Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577 Amelia_Bizzaro@fd.org Attorney for Petitioner Angel Garcia UNITED STATES DISTRICT Of Angel Garcia, Petitioner, v. Warden Baker, et al.,

POINTS AND AUTHORITIES

Petitioner Angel Garcia respectfully asks this Court to enter an Order extending his deadline for filing a counseled amended petition by 90 days from October 23, 2018 to January 21, 2019 file an amended petition.

This is Mr. Garcia's second request to extend his deadline. He previously received a 120-day extension.

In the last four months, counsel and her team have ordered records from at least 10 different entities in Nevada and California. Some records are still being processed. For example, last week a representative from Child Protective Services called to inform us that our request had been received and completed and the records had been sent to the Washoe County District Attorney's Office to be redacted and distributed. Undersigned counsel also filed a Petition for Release of Juvenile Records in Family Court in Washoe County on September 20, 2018. The Court has not yet ruled on that petition. Mr. Garcia's juvenile records are critical to counsel's review of the case because he asserted claims in his *pro se* federal petition related to his juvenile record and age at the time of the crime.

This requested extension will permit counsel time to obtain the records that have not yet been disclosed before filing an amended petition. It is not made for the purposes of delay, but rather in the interests of justice as well as Mr. Garcia's interests.

On October 23, 2018, counsel contacted Deputy Attorney General Jessica Perlick regarding this extension request. She has no objection.

1	Dated October 23, 2018.	
2		Respectfully submitted,
3		Rene L. Valladares
4		Federal Public Defender
5		/s/Amelia L. Bizzaro
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13		United States District Judge
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